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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HILLAIR CAPITAL INVESTMENTS, L.P.,

Plaintiff,

Docket No. 12-cv-7164 (AKH)

NOTICE OF CROSS-MOTION
TO AMEND ANSWER

-against-

INTEGRATED FREIGHT CORPORATION et. al.,

Defendants.
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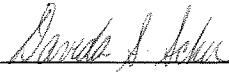
PLEASE TAKE NOTICE THAT, upon the annexed Affidavit of Monte Smith and the exhibits attached thereto, the undersigned will move this Court, in the Courtroom of Hon. Alvin Hellerstein, at the Courthouse located at 500 Pearl Street, New York, New York, 10007, for an Order pursuant to Fed. R. Civ. Pro. 15 permitting Defendant Smith Systems, Inc. to amend its Answer to include further defenses.

PLEASE TAKE FURTHER NOTICE that plaintiff's reply papers, if any, must be received at least ten business days before the return date by hand as moving party intends to file and serve reply papers. Such reply papers shall be served in hand at least two business days prior to return date.

Dated: New York, New York
March 4, 2015

Respectfully submitted,

FRANZINO & SCHER
Attorneys for Defendant Smith Systems

By: 
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